



**COUNT ONE**

**(Conspiracy to Possess With Intent to Distribute Controlled Substance)**

Between on or about January 1, 2005 and continuing until on or about December 23, 2014, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants,**

**AARON RAUL CERVANTES,  
JOSE HERRERA-ALVARADO,  
aka "FROILAN HERRERA-ALVARADO  
aka "ULIEL MONTERO"  
aka "EDDIE"  
PEDRO HERRERA-ALVARADO,  
aka "ALFREDO BETRON-LEYVA"  
aka "JAVIER AVILES-REBOLLAR"  
aka "GUSTAVO GALICIA-ALCANTRA"  
aka "KIKI"  
aka "JOSE"  
HENRY ORTIZ, JR.,  
JAGDEEP DHILLON,  
aka "TONY"  
aka "EL INDIO"  
GENARO NUNEZ,  
aka "GORDO"  
aka "MUELAS"  
DEMETRIO PAZ RODRIGUEZ,  
aka "Junior"  
JAIME TELLES-SANTOS,  
aka "VENADO"  
MARINETTE WOODS,  
aka "HONEY"**

did knowingly and intentionally conspire and agree with at least one other person to possess with intent to distribute at least 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A).

**COUNT TWO**

**(Possession With Intent to Distribute Controlled Substance)**

On or about April 9, 2014, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants,**

**JOSE HERRERA-ALVARADO,  
aka "FROILAN HERRERA-ALVARADO  
aka "ULIEL MONTERO"  
aka "EDDIE"  
PEDRO HERRERA-ALVARADO,  
aka "ALFREDO BETRON-LEYVA"  
aka "JAVIER AVILES-REBOLLAR"  
aka "GUSTAVO GALICIA-ALCANTRA"  
aka "KIKI"  
aka "JOSE,"  
GENARO NUNEZ,  
aka "GORDO"  
aka "MUELAS"  
DEMETRIO PAZ RODRIGUEZ,  
aka "Junior"  
JAIME TELLES-SANTOS,  
aka "VENADO"**

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved a quantity of 1 kilogram or more, that is approximately 2 kilograms, of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT THREE**

**(Conspiracy to Possess With Intent to Distribute Controlled Substance)**

On or about April 9, 2014, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants,**

**JOSE HERRERA-ALVARADO,  
aka "FROILAN HERRERA-ALVARADO  
aka "ULIEL MONTERO"  
aka "EDDIE,"  
PEDRO HERRERA-ALVARADO,  
aka "ALFREDO BETRON-LEYVA"  
aka "JAVIER AVILES-REBOLLAR"  
aka "GUSTAVO GALICIA-ALCANTRA"  
aka "KIKI"  
aka "JOSE,"  
GENARO NUNEZ,  
aka "GORDO"  
aka "MUELAS"  
DEMETRIO PAZ RODRIGUEZ,  
aka "Junior"  
JAIME TELLES-SANTOS,  
aka "VENADO"**

did knowingly and intentionally conspire and agree with each other and with other persons known and unknown to the Grand Jurors to possess with intent to distribute 50 grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A).

**COUNT FOUR**

**(Possession With Intent to Distribute Controlled Substance)**

On or about April 9, 2014, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants,**

**GENARO NUNEZ,  
aka "GORDO"  
aka "MUELAS"  
DEMETRIO PAZ RODRIGUEZ,  
aka "Junior"  
JAIME TELLES-SANTOS,  
aka "VENADO"**

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved a quantity of 50 grams or more, that is approximately 251 grams, of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT FIVE**

**(Conspiracy to Possess With Intent to Distribute Controlled Substance)**

On or about April 9, 2014, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants,**

**JOSE HERRERA-ALVARADO,  
aka "FROILAN HERRERA-ALVARADO  
aka "ULIEL MONTERO"  
aka "EDDIE,"  
PEDRO HERRERA-ALVARADO,  
aka "ALFREDO BETRON-LEYVA"  
aka "JAVIER AVILES-REBOLLAR"  
aka "GUSTAVO GALICIA-ALCANTRA"  
aka "KIKI"  
aka "JOSE,"  
GENARO NUNEZ,  
aka "GORDO"  
aka "MUELAS"  
DEMETRIO PAZ RODRIGUEZ,  
aka "Junior"  
JAIME TELLES-SANTOS,  
aka "VENADO"**

did knowingly and intentionally conspire and agree with each other and with other persons known and unknown to the Grand Jurors to possess with intent to distribute cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(C).

**COUNT SIX**

**(Possession With Intent to Distribute Controlled Substance)**

On or about April 9, 2014, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants,**

**GENARO NUNEZ,  
aka "GORDO"  
aka "MUELAS"  
DEMETRIO PAZ RODRIGUEZ,  
aka "Junior"  
JAIME TELLES-SANTOS,  
aka "VENADO"**

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved a quantity of approximately 200 grams of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT SEVEN**

On or about April 9, 2014 in the Southern District of Texas and within the jurisdiction of the Court, defendant

**DEMETRIO PAZ RODRIGUEZ,  
aka "Junior"**

previously having been convicted in the 230<sup>th</sup> Judicial District Court of Harris County, Texas, on September 6, 1990, for the felony offense of Burglary of a Building, in Cause Number 569955, a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess in and affecting interstate commerce a firearm, namely a Tikka, model T3, .308 caliber rifle, serial number 739436.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924 (a)(2).



**COUNT EIGHT**

**(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)**

On or about April 9, 2014, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants,**

**GENARO NUNEZ,  
aka "GORDO"  
aka "MUELAS"  
DEMETRIO PAZ RODRIGUEZ,  
aka "Junior"  
JAIME TELLES-SANTOS,  
aka "VENADO"**

did knowingly and intentionally possess a firearm, that is a Tikka, model T3, .308 caliber rifle, serial number 739436, in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, that is Conspiracy to Possess with Intent to Distribute and Possession with Intent to Distribute a Controlled Substance as charged in Counts One through Six of the Indictment.

In violation of Title 18, United States Code, Sections 924 (c)(1)(A)(i), 924(c)(1)(C)(i) and, and Title 18, United States Code, Section 2.

**COUNT NINE**

**(Possession With Intent to Distribute Controlled Substance)**

On or about December 23, 2014, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants,**

**AARON RAUL CERVANTES,  
JOSE HERRERA-ALVARADO,  
aka "FROILAN HERRERA-ALVARADO  
aka "ULIEL MONTERO"  
aka "EDDIE"  
PEDRO HERRERA-ALVARADO,  
aka "ALFREDO BETRON-LEYVA"  
aka "JAVIER AVILES-REBOLLAR"  
aka "GUSTAVO GALICIA-ALCANTRA"  
aka "KIKI"  
aka "JOSE"**

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved a quantity of 1 kilogram or more, that is approximately 3 kilograms, of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

**NOTICE OF CRIMINAL FORFEITURE**  
(21 U.S.C. § 853)

Pursuant to Title 21, United States Code, Section 853(a), the United States gives notice to  
Defendants,

**AARON RAUL CERVANTES,  
JOSE HERRERA-ALVARADO,  
aka "FROILAN HERRERA-ALVARADO  
aka "ULIEL MONTERO"  
aka "EDDIE"  
PEDRO HERRERA-ALVARADO,  
aka "ALFREDO BETRON-LEYVA"  
aka "JAVIER AVILES-REBOLLAR"  
aka "GUSTAVO GALICIA-ALCANTRA"  
aka "KIKI"  
aka "JOSE"  
HENRY ORTIZ, JR.,  
JAGDEEP DHILLON,  
aka "TONY"  
aka "EL INDIO"  
GENARO NUNEZ,  
aka "GORDO"  
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DEMETRIO PAZ RODRIGUEZ,  
aka "Junior"  
JAIME TELLES-SANTOS,  
aka "VENADO"  
MARINETTE WOODS,  
aka "HONEY"**

that in the event of conviction of an offense in violation of Title 21, United States Code, Sections 841 or 846 as charged in Counts One, Two, Three, Four, Five, Six, and Nine of the Indictment, the following is subject to forfeiture:

- (1) all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and
- (2) all property used, or intended to be used, in any manner or part, to commit, or to

facilitate the commission of, such violation.

**NOTICE OF CRIMINAL FORFEITURE**  
(18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c))

Pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the United States of America hereby gives notice to defendants:

**GENARO NUNEZ,**  
    **aka “GORDO”**  
    **aka “MUELAS”**  
**DEMETRIO PAZ RODRIGUEZ,**  
    **aka “Junior”**  
**JAIME TELLES-SANTOS,**  
    **aka “VENADO”**

that upon conviction of a violation of Title 18, United States Code, Sections 922(g) and 924(c) as set forth in Counts Seven and Eight, all firearms and ammunition involved in or used in such offense are subject to forfeiture.

**PROPERTY SUBJECT TO FORFEITURE**

Defendants are notified that the property subject to forfeiture includes, but is not limited to:  
Approximately 3 MILLION, EIGHT HUNDRED THOUSAND DOLLARS (\$3,800,000.00)  
in United States currency

**MONEY JUDGMENT**

Defendants are notified that in the event of conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture, for which the defendants may be jointly and severally liable.

**SUBSTITUTE ASSETS**

Defendants are notified that in the event that property subject to forfeiture, as a result of

any act or omission of defendants,

- (A) cannot be located upon the exercise of due diligence;
- (B) has been transferred or sold to, or deposited with, a third party;
- (C) has been placed beyond the jurisdiction of the court;
- (D) has been substantially diminished in value; or
- (E) has been commingled with other property that cannot be divided without difficulty,

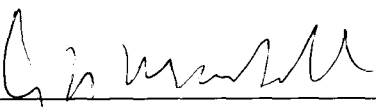
the United States will seek to forfeit any other property of the defendants up to the total value of the property subject to forfeiture pursuant to Title 21, United States Code, Section 853(p) and as incorporated by reference in Title 28, United States Code, Section 2461(c).

A TRUE BILL:

Original Signature on File

FOREMAN OF THE GRAND JURY

KENNETH MAGIDSON  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
CASEY N. MACDONALD  
Assistant United States Attorney